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*Attorneys for Plaintiffs*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

CHASOM BROWN, WILLIAM BYATT,  
JEREMY DAVIS, CHRISTOPHER  
CASTILLO, and MONIQUE TRUJILLO  
individually and on behalf of all similarly  
situated.

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

## **SUSMAN GODFREY L.L.P.**

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Case No.: 4:20-cv-03664-YGR-SVK

**PLAINTIFFS' ADMINISTRATIVE  
MOTION TO CONSIDER WHETHER  
PORTIONS OF PLAINTIFFS' REPLY IN  
SUPPORT OF THEIR RENEWED  
REQUEST TO DEPOSE GOOGLE CEO  
SUNDAR PICHAI SHOULD BE SEALED**

The Honorable Susan van Keulen

1 Pursuant to Civil Local Rule 79-5, Plaintiffs respectfully ask the Court to consider whether  
 2 Google LLC's ("Google") material should be sealed. The material is included within Plaintiffs'  
 3 Reply in Support of Their Renewed Request to Depose Google CEO Sundar Pichai ("Plaintiffs'  
 4 Reply").

5 Plaintiffs reserve their right to oppose Google's request to seal.

6 Document Sought to 7 be Sealed	Party Claiming Confidentiality	Portions to be filed under seal	Basis for Sealing Portion of Document
8 Plaintiffs' Reply	9 Google	10 Portions highlighted 11 yellow on pages 1, 2, 12 3, 4, and 5.	13 Refers to material 14 designated 15 "CONFIDENTIAL" and "ATTORNEYS' EYES ONLY" pursuant to the Protective Order
16 Exhibit EE of Exhibit 17 1 (Declaration of Rossana Baeza) to Plaintiffs' Reply	18 Google	19 Entire document	20 Refers to material 21 designated 22 "CONFIDENTIAL" and "ATTORNEYS' EYES ONLY" pursuant to the Protective Order

23 Pursuant to Civil Local Rule 79-5(f), Google, as the Designating Party, bears the  
 24 responsibility to establish that its designated material is sealable.

25 Dated: August 9, 2022

26 Respectfully submitted,

27 By: /s/ Beko Reblitz-Richardson

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